REMARKS

Applicants hereby request further consideration of the application in view of the amendments above and the comments that follow.

Status of the Claims

Claims 1-22 are now pending in the present application. Claims 1-21 were pending at the time of examination. Claims 1-4, 7-11, 14-18 and 21 stand rejected under Section 103(a) as being unpatentable over U.S. Patent No. 6,252,592 to King et al. (King) in view of U.S. Patent No. 4,646,250 to Childress (Childress). Claims 5-6, 12-13 and 19-20 stand rejected under Section 103(a) as being unpatentable over King in view of Childress and further in view of the published paper ("Grouping Objects for Tabbing and Cursoring in Visual Programming", 05/05/1995, pp. 561-563) to Cox et al. (Cox).

The Rejections under Section 103(a)

To establish a *prima facie* case of obviousness, the prior art reference or references when combined must teach or suggest all the recitations of the claim, and there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. MPEP § 2143. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. MPEP § 2143.01.

Claim 1 recites:

1.   A method for displaying a plurality of visual elements associated with a computer program application, said method comprising:
        defining a sequential tabbing order for the plurality of visual elements; and
        displaying at least one graphical linking element extending between the plurality of visual elements, wherein the at least one graphical linking element represents the sequential tabbing order.

The Action cites the labels 1-7 of **Figure 2** of King as corresponding to the graphical linking

elements as claimed, but acknowledges that King does not teach that the labels 1-7 extend

between the visual elements (*i.e.*, "name", etc.). However, the Action contends:

> However, Childress teaches a user interface displaying a plurality
> of visual elements comprising a feature of defining a sequential tabbing
> order for the plurality of visual elements that conventionally allows the
> cursor to be moved to the next data entry field in response to the user
> presses the tab key (e.g., see col. 1 lines 21-38). Childress further teaches
> line segments with direction graphical element extending between the
> plurality of visual elements (e.g., an arrow) is used to identify data entry
> field (e.g., see Fig. 1 and col. 2 lines 18-51).
>
> Accordingly, it would have been obvious to one of ordinary skill at
> the time the invention was made to modify the graphical linking element
> as taught by King to include the graphical linking element extending
> between the plurality of visual elements because one skilled in the art
> would reasonably be expected to display arrows demonstrating the
> connection between the visual elements to provide visual cues for data
> entry field identification and as suggested by King, the motivation for the
> combination is to make it easier and convenient for a developer to view
> and set the tabbing order associating with a particular visual element in
> order to insure the accuracy of the tabbing order (e.g., see King col. 3 lines
> 4-10).

Applicants respectfully submit that the Examiner has clearly failed to present a proper *prima*

facie obviousness rejection.

Both King and Childress fundamentally fail to teach or suggest provision of a

graphical linking element <u>extending between</u> visual elements and that <u>represents a sequential</u>

<u>tabbing order</u> between the visual elements. As acknowledged by the Action, King fails to

teach or suggest graphical linking elements extending between visual elements. While

Childress discloses the use of arrows at col. 2, lines 18-51, and **Figure 1**, the arrows clearly

do not extend between elements and represent a sequential tabbing order between the visual

elements. First, Childress' arrows do not extend between visual elements. Rather, each

arrow merely resides beside and points to its respective data entry field. Furthermore,

Childress' arrows have no relation to tabbing order. Rather, each arrow simply serves to

indicate the presence of a data entry field and its status (mandatory or non-mandatory), not a predefined tabbing order.

Moreover, Childress and King are directed to very different products, methods and functions. King is directed to a tool and method for use by a software developer to assess an order and properties or attributes of visual elements to assist the developer in designing or constructing a graphical user interface (GUI). Childress, on the other hand, is directed to a system for indicating to an end user of an application those fields where data must be entered (*see, e.g.,* Childress at col. 1, lines 6-10, and col. 2, lines 6-51). The ordinarily skilled artisan in the field of designing tools for software developers (and, in particular, GUI building tools) would not look to a reference such as Childress, which is directed to an altogether different purpose and set of users.

Further, the motivation proposed by the Action falls well short of that required to establish a proper §103 rejection, particularly in view of King itself. The disclosure of King cited by the Action (*i.e.*, col. 3, lines 4-10) merely describes general activities of a developer designing a user interface for a computer program application. The remainder of King's "Background of the Invention" section thereafter describes prior art methods or tools for assisting the developer in reviewing tabbing order. As best understood, King proposes to improve upon these prior art methods by employing a method that does not rely on static visual indicia (*See, e.g.,* King at col. 4, lines 28-45). Thus, the proposed motivation to provide further or enhanced static visual indicia is not at all apparent from King itself.

In view of the foregoing, Applicants respectfully submit that Claim 1 is clearly allowable over the cited art. Claims 2-7 and 22 depend from Claim 1 and are therefore allowable as well for at least the foregoing reasons.

Claims 8 and 15 are directed to a system and a computer program product, respectively, generally corresponding to the method of Claim 1 and are therefore allowable as well for the foregoing reasons. Claims 9-14 depend from Claim 8 and Claims 16-21 depend from Claim 15.

At least certain of dependent Claims 2-7, 9-14, and 16-22 are further distinguishable from the cited art. However, in view of the clear patentability of Claims 1, 8 and 15 over the

cited art, Applicants do not believe further discussion of the dependent claims is needed at this time.

CONCLUSION

Applicants respectfully submit that this application is now in condition for allowance, which action is requested. Should the Examiner have any matters outstanding of resolution, he is encouraged to telephone the undersigned at 919-854-1400 for expeditious handling.

Respectfully submitted,

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